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Assistant Regional Counsel
Office of Regional Counsel
United States Environmental Protection Agency – Region 4
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Atlanta, Georgia 30303

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Environment

Subject:

Response to USEPA Letter dated January 24, 2020 Former Virginia-Carolina Chemical Corporation Sites

Date:

March 19, 2020

Contact

Corrie Chwalek

Phone:

919.415.2286

Email:

Corrie.Chwalek @arcadis.com

Dear Ms. Jones:

This letter confirms receipt of the United States Environmental Protection Agency (USEPA) letter dated January 24, 2020 regarding the status of ExxonMobil Corporation's implementation of institutional controls (ICs) at the Former Virginia-Carolina Chemical Corporation (VCC) Sites located in Alabama, Georgia, Kentucky, North Carolina, South Carolina, and Tennessee. On behalf of ExxonMobil Environmental and Property Solutions Company (E&PS), Arcadis U.S., Inc. (Arcadis) has prepared this letter response.

At the former VCC Sites, soil and/or sediment generally containing arsenic and/or lead above the site-specific action levels were removed and replaced with clean fill in accordance with enforcement documents documented in the January 24, 2020 letter from USEPA. Soil removal activities began as early as 2002 and the last Site is nearing completion (VCC Black Leaf). Additionally, multiple phases of soil/sediment removal have occurred at numerous sites based on planned work by others, including but not limited to, utility work, redevelopment of the property by the owner, site improvements, site access, or at the property owner's request. Several VCC sites identified groundwater concentrations above site-specific action levels prior to soil removal. Following soil removal, groundwater quality was expected to improve; therefore, post-removal groundwater monitoring was proposed for a period of 5 years or until a statistically significant data set could be gathered to evaluate trends in groundwater concentrations. Many of these sites have recently completed the 5 years of post-removal groundwater monitoring and groundwater data evaluation is currently underway.

ICs have not been pursued at many VCC sites where groundwater evaluations are pending since groundwater use may not require restrictions. To date, long-term groundwater monitoring has been closed out at 5 VCC sites post soil/sediment removal (VCC Rome, VCC Blacksburg, VCC Charlotte, VCC Memphis, and VCC Wando), thus negating the requirement for restrictions on groundwater use. Additionally, groundwater exceedances above the site-specific standards at select VCC sites is limited to only a few properties and not the entirety of the associated sites.

As you are aware, E&PS has had success implementing ICs in certain states, such as South Carolina, while there have been obstacles to implementation in other states. For example, in North Carolina, each property owner is required to sign a Voluntary Consent to Imposition of Land Use Restrictions (Consent Form) prior to signing the actual deed restriction. Ultimately, only three Consent Forms were returned; most property owners were unresponsive or never returned the signed Consent Form even after multiple follow-ups. Additionally, a Draft Declaration of Perpetual Land Use Restriction (DPLUR), along with the accompanying Notice Plat were submitted to the North Carolina Department of Environmental Quality (NCDEQ) for review and approval on August 17, 2015. A few minor comments were received on the Notice Plat; however, the DPLUR language has not been approved by NCDEQ. On March 2, 2017, NCDEQ, E&PS, and Arcadis met to discuss potential pathways to site closure and DPLURs. Risk-based closure was discussed as an option for some sites which would require the development of a Remedial Action Plan (RAP). NCDEQ indicated they prefer to review DPLUR language as part of a RAP submittal. Prior to RAP development, the group agreed to the collection of additional groundwater data so that a statistically significant data set could be gathered to evaluate trends in groundwater concentrations. The development of a RAP and/or DPLURs was deferred by NCDEQ until additional data was obtained and submitted. On February 3 and 4, 2020, the group met again to discuss potential pathways to site closure and DPLURs. NCDEQ also indicated a Remedial Investigation Report may be required for most sites. In addition, it was determined that a few sites may require groundwater delineation downgradient prior to development of these reports. Consequently, the obstacles and delays we have experienced in our efforts to secure ICs in NC, have not been due to any actions or lack of diligence on our part.

IC implementation in Georgia has likewise been delayed by a lengthy approval process and prevented by the various requirements of the Georgia statute and not due to any action or lack of diligence on our part. To implement the ICs, E&PS prepared a form of recordable restrictive agreement entitled Declaration of Environmental Covenant (DEC) pursuant to the Uniform Environmental Covenant Act (UECA) adopted in the State of Georgia. The DEC was submitted to Kevin Beswick, Senior Counsel at the USEPA, on November 23, 2010 for review and comment. USEPA responded on March 2, 2011 acknowledging receipt and that the DEC was sent to the Georgia Attorney General and to the Georgia Environmental Protection Division (GAEPD) for review and comment. USEPA responded in October 2011 that the Attorney General and the GAEPD declined to review the DEC, thus allowing USEPA to negotiate and approve the DEC. Thereafter, E&PS received and responded to the USEPA's comments and proposed revisions to the DEC, and USEPA approval of the DEC was received from Kevin Beswick of USEPA on January 23, 2012.

Pursuant to the requirements of the UECA in Georgia, numerous notifications are required prior to execution of deed restrictions, e.g., each municipality/county/local government where the property is

located, each property owner, each person in possession of the property (renter/tenant), each owner whose land abuts the property, each holder of an interest in the property (easement, lien holder, mortgage holder) and anyone else USEPA requires. E&PS has performed title searches and compiled information as to notifications required on a few of the VCC sites in Georgia. Due to the complexity of implementation of the ICs in Georgia, E&PS tried to navigate the UECA requirements at the VCC Atlanta Site first since it had the least number of property owners (only two) and started with the largest property which is owned by The Atlanta Board of Education, the governing body of the Atlanta Public Schools. Although at first The Atlanta Board of Education was engaged in review of the documents, they have become unresponsive to follow up requests for review and signature of the required language.

E&PS (Bruce Frink), Womble Bond Dickinson (Carolyn Wilson), and Arcadis (Corrie Chwalek and Kirstyn White) met with USEPA (Franklin Hill, Ken Mallary, and Randall Chaffins) on April 4, 2019 to discuss difficulty in obtaining ICs. E&PS requested USEPA's assistance with strategies to approach property owners to facilitate understanding of the deed restrictions and the benefits to the property owners. The challenge in meeting the numerous notification requirements of the UECA adopted in Georgia was also discussed. In furtherance of the foregoing:

- Franklin Hill agreed on behalf of the USEPA to meet with E&PS and representatives of the VCC
 Atlanta property owner to discuss the VCC program and implementing deed restrictions (Franklin
 Hill has since retired from USEPA prior to conducting this meeting).
- Franklin Hill agreed to ask USEPA attorneys whether UECA even applies to the VCC program sites in Georgia (again, Franklin Hill has since retired from USEPA and a response has not been received).
- Ken Mallary of USEPA agreed to investigate using Recorded Notices instead of deed restrictions signed by the property owner(s). Franklin Hill agreed to ask USEPA attorneys about using Recorded Notices instead of deed restrictions (both Franklin Hill and Ken Mallary have both since retired from USEPA).

E&PS has also encountered resistance and refusal from many property owners in response to our request to implement ICs on their properties. Some property owners have simply failed or refused to respond after multiple attempts while others outright refuse to sign the required documents. This information, as well as information requested by USEPA on the status of the ICs at the VCC Sites where deed restrictions are outstanding is summarized in Table 1. Table 1 lists the VCC sites in Georgia, North Carolina, South Carolina, Tennessee, Alabama, and Kentucky along with the site name, Tax Parcel Number/Identification, owner name, physical property address, property contact information where available, delineation information, comments on status, and next steps. Additionally, a figure for each site where all ICs have not been obtained is attached.

E&PS looks forward to meeting with USEPA in the near future to develop a road map for obtaining the remaining ICs on the VCC sites within USEPA Region 4. If you have any questions or comments, please let us know.

Sincerely,

Arcadis U.S., Inc.

Corrie Chwalek

Program Manager

Copies:

Leigh Lattimore – USEPA Bruce Frink – E&PS

Corixla Chualet

Enclosures:

Table

Details on Remaining VCC Deed Restrictions

Figures

Georgia Sites (G-1 Atlanta, G-2 Macon, G-3 Rome, and G-4A and G-4B Social Circle)

North Carolina Sites (NC-1 Charlotte, NC-2 Durham, NC-3 Wadesboro, NC-4 Wilmington - Almont, NC-5 Wilmington - Navassa, NC-6 Winston-Salem)

South Carolina Sites (SC-1 Atlantic, SC-2 Blacksburg, SC-3 Greenville, SC-4 Pon Pon, SC-5 Port of Baldwin Mines, SC-6 Swift, SC-7 Wando)

Tennessee Sites (T-1 Memphis)

Alabama Sites (A-1 Birmingham, A-2 Mobile, A-3 Wylam)

Kentucky Sites (K-1 Black Leaf)

| Site Name | Tax Parcel Number/ | 0,,,,,,,,, | Dhysical Drawarty Address | Drawantu Cantaat Information | Delineation Information | Comments on Status | Nové Céana |
|-----------|--------------------------------|----------------------------|--|--|--|--|--|
| | Identification | Owner | Physical Property Address | Property Contact Information | Delineation information | Comments on Status | Next Steps |
| | (0/2 deed restrictions r | recorded) | | | No groundwater sampling required. | | |
| | 15-210-02-012 15-210-02-014 | Atlanta Board of Education | 1631 Dekalb Avenue a/k/a 1631 LaFrance St., Atlanta, GA 187 Wesley Avenue, Atlanta, GA | Victor Gaither Energy & Environmental Services Manager Atlanta Public Schools 1631 LaFrance Street, N.E Atlanta, Georgia 30307 404-802-3767 Office 678-733-7958 Cell | Soil removed in 2012/2013. Arsenic and lead remain in soil under cap. | Draft deed restriction sent to Atlanta Board of Education in July 2014. Contact reviewed and engaged attorney. After multiple requests, no signature was received Re-engaged with owner in Q1 2018. Sent request for review on 5/3/18 after contact requested review of areas in re-paving area. No response received to date. | |
| | 15-210-03-172 | Montez E. Austin, Sr. | 0 New Street | Montez E. Austin, Sr. 2300 Holcomb Bridge Rd, Ste 103-214, Roswell, GA 30076 | Soil removed in 2012/2013. Arsenic and lead remain in soil under cap. | Awaiting APS restriction first due to notification requirements. Property has changed hands per recent title search. | Develop road map with USEPA to implment deed restrictions. |
| Macon, GA | (0/7 deed restrictions r | ecorded) | | | [| On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | |
| | R083-0124, Q084-0227 | Block Company, Inc. | 192 Elm Street Macon, GA 31206 1410 Seventh Street Macon, GA 31206 | Reg'd Agt/CEO: Donald C. Sheffield 305 Wesley Cir. Macon, GA 31204 478-319-8557, cell: 478-319-8557 Prin. Office: PO Box 45 Macon, GA 31202 | Soil removed in 2015. Arsenic and lead remain in soil under cap and arsenic is in the groundwater. | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |
| | R083-0126 | Macon Concrete, LLC | 191 Lower Elm Street Macon, GA 31206 | PO Box 51 Macon, GA 31201 Ernest Mitchell (onsite contact) 478-757-7777 Mark Turner (owner) 912-660-7788 | Soil removed in 2015. Arsenic and lead remain in soil under cap and arsenic is in the groundwater. | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |
| | R083-0129 | | 206 Lower Elm Street Macon, GA 31206 | Ric Geyer ric@787windsor.com | Soil removed in 2015. Arsenic and lead remain in soil under cap and arsenic is in the groundwater. | New owner as of Jan 2019; On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |
| | | Georgia Power | | Hollister A. Hill Troutman Sanders LLP Bank of America Plaza, Suite 5200 600 Peachtree Street, N.E. Atlanta, Georgia 30308-2216 Telephone 404/885-3366 Cell Phone 678/478-2551 Facsimile 404/962-6587 hollister.hill@troutmansanders.com Lea Millet Southern Co 241 Ralph McGill Blvd B10221 Atlanta, GA 30308 404-506-6235 (o) | Soil removed in 2015. Arsenic and lead remain in soil under cap and arsenic is in the groundwater. | Email from GA Power received 5/30/18 asking about restrictions. On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |
| | RR ROW | Norfolk Southern | RR ROW | 205-288-0287 (m) Tim Royer, CHMM Georgia Power – Environmental Affairs 404-506-6246 office 404-290-8099 cell | Soil removed in 2015. Arsenic and lead remain in soil under cap and arsenic is in the groundwater. | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |
| | R083-0162 | 1 2 | 0 Seventh Street Macon, GA 31206 | tsroyer@southernco.com 700 Poplar Street Macon City Hall Macon, GA 31203 Bill Causey 478-621-6786 | Soil removed in 2015. Arsenic and lead remain in soil under cap and arsenic is in the groundwater. | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |
| | R083-0163 | Payman Corporation | 181 Lower Elm Street, Macon, GA 31206 | Reg'd Agt/CEO: Vic P. White 150 Roberson Mill Rd. Milledgeville, GA 31061 748-746-7501 Prin. Office: PO Box 1545 Milledgeville, GA 31059 | Soil removed in 2015. Arsenic and lead remain in soil under cap and arsenic is in the groundwater. | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |

| Site Name | Tax Parcel Number/ Identification | Owner | Physical Property Address | Property Contact Information | Delineation Information | Comments on Status | Next Steps |
|------------|-----------------------------------|-----------------------------|--|---|--------------------------------------|---|--|
| GA | (0/4 deed restrictions re | | The second of th | Troporty Community | Long-term groundwater monitoring | On hold pending Atlanta test case. Working with attorney on language, title | 11020 0000 |
| | | | | | termination approved in November | searches, and notification requirements. Long-term GW monitoring terminated Nov | |
| | MEV 007 | Thomas Watkins | 20 Develop Chroat | Thomas Watkins | 2017. Soil removed in 2011/2012. | 2017; GW does not require restriction. | Develop rood man with LICED |
| | J15Y 027 | Thomas Watkins | 20 Douglas Street | Thomas Watkins 100 Gilbert Street | Arsenic and lead remain in soil | Divorce affected ownership; title is now resolved. On hold pending Atlanta test case. Working with attorney on language, title searches, and notification | Develop road map with USEP/ implment deed restrictions. |
| | | | | Hopkinsville, KY 42240 | under cap. | requirements. | Implinent deed restrictions. |
| | | | | 270-348-5790 | under cap. | | |
| | J15Y 021 | Southern Wholesale Co. | Old Lindale Road (off) | John Howard | Soil removed in 2011/2012. | Property owner requested comfort letter in Q1 2018 for pending sale; sale fell | Develop road map with USEP |
| | J15Y 025 | Southern Wholesale Co. | 14 Douglas Street | PO Box 851 | Arsenic and lead remain in soil | through but there has been more interest. On hold pending Atlanta test case. | implment deed restrictions. |
| | 3131 023 | | 14 Douglas Street | Lafayette, GA 30728 | under cap. | Working with attorney on language, title searches, and notification requirements. | Implinent deed restrictions. |
| | | | | 706-638-8184 (home) | under cap. | Working with attorney on language, title searches, and notification requirements. | |
| | | | | 423-413-4442 (cell) | | | |
| | J15Y 020 | Rome-Floyd County Dev't | 0 Old Lindale Road | Rome-Floyd County Development Authority | Soil removed in 2011/2012. | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | J15Y 026 | Auth. | 0 Douglas Street (off) | Attn: Andy Davis | Arsenic and lead remain in soil | searches, and notification requirements. | implment deed restrictions. |
| | | | 0 20 49.40 0001 (0) | PO Box 5513 | under cap. | | |
| | | | | Rome, GA 30162 | and sup. | | |
| | | | | 706-291-8853 | | | |
| | J15Y 024 | Kellogg USA, Inc. | 452 Old Lindale Road | Kellogg Company | Soil removed in 2011/2012. | In early 2012 after Kellogg USA refused to allow access for remediation and | Confirm with USEPA that no |
| | | | | 235 Porter Street | | demanded \$300k diminution in value and \$300k escrow, David Mantor | additional document will be |
| | | | | Battle Creek, MI 49016 | under cap. | communicated with Kevin Beswick of EPA. Per 3/1/12 emails, Kevin reviewed the | required. |
| | | | | 269-961-3754 - Gordon Paulson attorney | · ' | data and confirmed that EPA would not require any removal and waived any | ' |
| | | | | · · | | restrictive covenants contemplated by AOC. | |
| Circle, GA | (0/16 deed restrictions | recorded) | | | No groundwater sampling required. | On hold pending Atlanta test case. Working with attorney on language, title | |
| · | , | , | | | | searches, and notification requirements. | |
| | SC160011A00 | John Lunsford | 640 E. Hightower Trail | John Lunsford | Soil removed in 2008. Arsenic and | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | | | | 1245 Upchurch Rd | lead remain in soil under buildings, | searches, and notification requirements. | implment deed restrictions. |
| | | | | McDonough, GA 30252 | driveways. | | |
| | SC160011B00 | McNeil Investments, LLD | 644 E. Hightower Trail | McNeil Investments LLC | Soil removed in 2008. Arsenic and | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | | | | 1310 Summer Hollow Rd | lead remain in soil under buildings, | searches, and notification requirements. | implment deed restrictions. |
| | | | | Greensboro, GA 30642 | driveways. | | |
| | SC16002900 | James Culpepper | 669 E. Hightower Trail | James Culpepper | | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | | | | PO Box 1855 | | searches, and notification requirements. | implment deed restrictions. |
| | | | | Monroe, GA 30655 | driveways. | | |
| | SC160011C00 | Stephanie Williams | 670 E. Hightower Trail | Stephanie Williams | | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | | | | 670 E Hightower Trail | • | searches, and notification requirements. | implment deed restrictions. |
| | | | | Social Circle, GA 30025 | driveways. | | |
| | | | | 770-464-9805 | | | |
| | SC160011D00 | Shirley Farrar | 690 E. Hightower Trail | Shirley Farrar | I | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | | | | 690 E Hightower Trail | | searches, and notification requirements. | implment deed restrictions. |
| | 20100010100 | Oleana Incent | 740 F. History at Tasil | Social Circle, GA 30025 | driveways. | 0 - 1 - 1 1 1 2 Ada-da (- da) | D. |
| | SC160012A00 | Sharon Jones | 712 E. Hightower Trail | Sharon Jones | | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | | | | PO Box 171 | • | searches, and notification requirements. | implment deed restrictions. |
| | 00400040000 | One no mile and Alexade | 704 F. Himbtower Trail | Social Circle, GA 30025 | driveways. | On held nearling Atlanta test and Median with attended a language title | Daviden was dinaminish LICED |
| | SC160012000 | Gregory and Angela Robinson | 724 E. Hightower Trail | Gregory and Angela Robinson | | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEF implment deed restrictions. |
| | | Robinson | | 2460 Piney Grove Road Loganville, GA 30052 | driveways. | searches, and notification requirements. | impliment deed restrictions. |
| | SC160026000 | Dwayne Gray and Melvin | 727 E. Hightower Trail | Dwayne and Melvin Gray | | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEF |
| | 30 160026000 | · · | 727 E. Hightower Trail | 2900 Atkinson Road | | searches, and notification requirements. | implment deed restrictions. |
| | | Gray | | Loganville, GA 30052 | driveways. | searches, and notification requirements. | impiment deed restrictions. |
| | | | | 770-466-5258 | dilveways. | | |
| | SC160014000 | Donna Jackson | 726 E. Hightower Trail | Donna Jackson | Soil removed in 2008 Arsenic and | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | 30100014000 | Donna Jackson | 720 E. Hightower Hall | 726 E Hightower Trail | I | searches, and notification requirements. | implment deed restrictions. |
| | | | | Social Circle, GA 30025 | driveways. | dearones, and notification requirements. | Implifient deed restrictions. |
| | | | | 770-464-9593 | diveways. | | |
| | | | | 770-404-9393 770-715-7190 (cell) | | | |
| | SC160016000 | Lisa Reynolds Williams | 728 E. Hightower Trail | Lisa Reynolds Williams | Soil removed in 2008 Arsenic and | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | | =.oa raynolas vviillanis | Lo E. Frightowor Hall | 728 E Hightower Trail | | searches, and notification requirements. | implment deed restrictions. |
| | | | | Social Circle, GA 30025 | driveways. | dourseles, and notinoution requirements. | Impimoni doda restrictions. |
| | | | | 770-464-0714 | | | |
| | NS16A004000 | HA County, LLC | 113 Dove Landing | HA County, LLC | Soil removed in 2008 Arsenic and | On hold pending Atlanta test case. Working with attorney on language, title | Develop road map with USEP |
| | 11010/1004000 | i " Coodinty, LLO | 1.10 Dovo Landing | PO Box 391 | | searches, and notification requirements. | implment deed restrictions. |
| | | | | Monroe, GA 30655 | driveways. | deal street, and notined their requirements. | pc.it acca restrictions. |
| | - | | | 1 | 14.11011410. | 1 | • |

| Site Name | Tax Parcel Number/ | Owner | Physical Property Address | Property Contact Information | Delineation Information | Comments on Status | Next Steps |
|----------------|--|--|---|--|--|--|--|
| | NS16A005000 | HA County, LLC | 117 Dove Landing | HA County, LLC PO Box 391 Monroe, GA 30655 770-267-2517 | | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA t implment deed restrictions. |
| | NS16A010000 | John and Carol Childs | 137 Dove Landing | John and Carol Childs 238 East Jefferson St Madison, GA 30650 | | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA t implment deed restrictions. |
| | NS16A011000 | The 142 Dove Landing Land Trust | 142 Dove Landing | The 142 Dove Landing Edwards Fiduciary Estoppel Land Trust PO Box 1273 Covington, GA 30015 | I | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |
| | NS16A046000 | Nancy Mock | 423 Dove Lane | Nancy Mock 65 Mystic Lane Social Circle, GA 30025 | Soil removed in 2010. Arsenic and lead remain in soil under buildings, driveways. | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |
| | Part of C3000-00000- 005-000 or C3000- 00000-500-0DP | CSX Transportation, Inc. | 2 properties | Kevin Boland, PG CSX Transportation, Inc. 6737 Southpoint Drive South, J-180 Jacksonville, FL 32216 904-716-0098, 904-357-7927 - Fax | Soil removed in 2008. Arsenic and | On hold pending Atlanta test case. Working with attorney on language, title searches, and notification requirements. | Develop road map with USEPA to implment deed restrictions. |
| RTH CAROLINA S | SITES | • | | , | | | - |
| arlotte, NC | (2/7 deed restrictions re | ecorded) | | | Groundwater sampling termination approved in November 2017. | NCDEQ prefers to review draft deed language as part of Remedial Action Plan (RAP) submittal. See additional detail in cover letter. RI Report may not be required for Charlotte. | |
| | 12103207 | Ned Morris Henson & Judith Mulligan | 2135 S. Tryon St. Charlotte, NC 28203 | Ned Henson 300 N. Dakota St. Charlotte, NC 28216 phone: 704-589-1324 | Accessible soil removed in 2013/2014. Possible arsenic and lead in soil under building on back of property. | Consent Form sent in 2014 and 2015. No response after multiple attempts to contact property owner. | Prepare RAP and attempt to reengage property owner. If no response, develop roadmap with USEPA to implement deed restrictions. |
| | 12103208 | Park Avenue Partners, LLC | 2139 Rampart St. Charlotte, NC 28203 | Scott Hensley 115 East Park Avenue, Suite B Charlotte, NC 28203 e-mail: shensley@piedmontproperties.com phone: 704-375-1164 | Accessible soil removed in 2013/2014. Possible arsenic and lead in soil under building. | Consent Form sent in 2014; Property owner refused to sign Consent Form and Deed Restrictions | Prepare RAP and develop roadm with USEPA to implement deed restrictions. |
| | 12103209 | 300 Rampart Owner LLC | 300 Rampart St. Charlotte, NC 28203 | JMC Holdings LLC Mike Mullaney e-mail: mmullaney@jmcholdingsllc.com Chris Deppoliti phone: 212-897-9769; cell 347-573-0657 email: cdeppoliti@jmcholdingsllc.com | Accessible soil removed in 2013/2014. Arsenic and lead in soil under western portion of building and western half of property behind the building. | Property was sold in October 2019. The new property owner is pursuing Brownfields Agreement which may eliminate the need for a separate deed restriction. | Confirm with USEPA that land use restrictions recorded under Brownfields Agreement meets the requirement of the AOC. |
| | 12103212 | Virginia L. Hargrave | 2132 Hawkins St. Charlotte, NC 28203 | Jinny Hargrave 10012 Brass Eagle Lane Charlotte, NC 28210 e-mail: carolinaclay@aol.com phone: 704-752-7122 | Accessible soil removed in 2013/2014. Possible arsenic and lead in soil under building and asphalt. | Consent Form signed and Plat drafted. | Prepare RAP. |
| | 12103213 | AP 2116 Hawkins Street, LLC | 2116 Hawkins Street, Charlotte, NC 28203 | Asana - Welch Liles 1616 Camden Rd, Ste 210 Charlotte, NC 28203 e-mail: wliles@asanapartners.com phone: 704-490-2528 | Accessible soil removed in 2018/2019. Arsenic and lead in soil under asphalt, soil cover, and trees/bushes. | Removal Action complete in January 2019. Revised 2019 RACR submitted in April 2019. Need to engage property owner. | Prepare RAP and send Consent Form to property owner. |
| | 12103220 | AP 307 W. Tremont, LLC | 307 W. Tremont Ave., Charlotte, NC 28203 | Asana - Welch Liles 1616 Camden Rd, Ste 210 Charlotte, NC 28203 e-mail: wliles@asanapartners.com phone: 704-490-2528 | | Brownfields Agreement estabilished for property on Nov. 5, 2015, which includes Land Use Restrictions | Confirm with USEPA that land use restrictions recorded under Brownfields Agreement meets the requirement of the AOC. |
| | 12103217 | P7/PSREG Tremont, LLC | 327 W. Tremont Ave., Charlotte, NC 28203 | c/o Pollack Shores - Virginia Swint e-mail: vswint@pollackshores.com Palmer McArthur e-mail: pmcarthur@pollackshores.com phone: W - 404-214-5336; M - 704-578-9324 | Accessible soil removed in 2013/2014 and 2017. Arsenic and lead in soil under building and soil cover. | Brownfields Agreement estabilished for property on Nov. 5, 2015, which includes Land Use Restrictions | Confirm with USEPA that land use restrictions recorded under Brownfields Agreement meets the requirement of the AOC. |

| Site Name | Tax Parcel Number/ | Owner | Physical Property Address | Property Contact Information | Delineation Information | Comments on Status | Next Steps |
|----------------------|--------------------------|---------------------------------|---|--|---|---|--|
| Durham, NC | (0/2 deed restrictions r | ecorded) | | | | Groundwater evaluation submitted in February 2020. NCDEQ prefers to review draft deed language as part of RAP submittal. See additional detail in cover letter. | |
| | 118815 | Lewis Family, LLC | 2700 Angier Ave Durham, NC 27703 | Scott Lewis Adams Magnetic Products, 888 Larch Ave., Elmhurst, IL 60126 e-mail: slewis@adamsmagnetic.com phone: 630-617-8880 | Accessible soil removed in 2012. Arsenic and lead remain in soil under cap and in adjacent groundwater. | Consent Form signed by property owner. Plat survey and deed restriction language approved by Exxon and submitted to NCDEQ in August 2015. Received minor comments from NCDEQ on the plat; however, NCDEQ never provided comments or approval of deed restriction language. NCDEQ stated deed restriction language must be submitted as part of RAP. | Redevelop downgradient well and sample for lead. Prepare RI Reporand RAP. |
| | 118830 | KJMM, LLC | 2714 Angier Ave Durham, NC 27703 | Drew Vermillion 3844 Somerset Dr. Durham, NC 27707 e-mail: drewvermillion@msn.com phone: 919-641-0941 | Accessible soil removed in 2012. Arsenic and lead remain in one location under soil cover and in groundwater. | Consent Form signed in 2014 and Plat drafted. Property owner name changed in Feb. 2016; new consent form likely required for updated property owner name. | Redevelop downgradient well and sample for lead. Prepare RI Reporand RAP. |
| Gurley - Selma, NC | (1/1 deed restriction re | corded; however, may need | on downgradient off-site properties) | | | • | |
| | | | | | | Deed restrictions on downgradient off-site properties to be determined in consultation with USEPA and NCDEQ following 2020 investigation of soil and gw. Completed soil sampling in Q1 2020 to evaluate the use of Enviroblend injections for groundwater treatment. | USEPA ROD requires construction of a PRB to address grundwater impacts. Prepare revised approach for addressing impacted groundwater following field work in 2020. |
| Wadesboro, NC | (0/3 deed restrictions r | ecorded) | | | | Need for deed restrictions pending evaluation of groundwater and possible risk- | |
| | 6484-00-36-4869.00 | Carl A. Weston | off Freebird Lane | Jeff Weston 9005 Parliament Drive Burke, VA 22015 e-mail: jeff.weston@verizon.net phone: 703-336-2662 | Soil removed in 2002/2003. Metals (cadmium, copper, iron, manganese, nickel, and zinc) remain in groundwater. | based closure. Modeling or groundwater delineation is required. Soil above site-specific action levels removed from property. Waiting on groundwater evaluation to determine if GW restrictions are required. Anticipated in 2020. | Per February 2020 meeting with NCDEQ, RI Report required followed by RAP. |
| | 6484-00-25-9093.00 | Scarborough, Donald P. & Elaine | 255/ 373 Stanback Ferry Ice Plant Road | Don Scarborough 209 E. Wade St, Wadesboro, NC 28170 e-mail: don@plankroadrealty.com phone: 704-694-8519 | Soil removed in 2002/2003. Metals (cadmium, copper, iron, manganese, nickel, and zinc) remain in groundwater. | Soil above site-specific action levels removed from property. Waiting on groundwater evaluation to determine if GW restrictions are required. Anticipated in 2020. | Per February 2020 meeting with NCDEQ, RI Report required followed by RAP. |
| | 6484-00-26-8226.00 | Anson Wood Products, Inc. | Stanback Ferry Ice Plant Road | Chip Miller PO Box 98 Mt. Gilead, NC 27306 e-mail: cmiller@jordanlumber.com phone: 910-220-0898 | Metals (cadmium, copper, iron, manganese, nickel, and zinc) remain in groundwater. | No soil exceedances on property. Waiting on groundwater evaluation to determine if GW restrictions are required. Anticipated in 2020. | Per February 2020 meeting with NCDEQ, RI Report required followed by RAP. |
| Wilmington (Almont), | (0/1 deed restriction re | corded) | | | | NCDEQ prefers to review draft deed language as part of RAP submittal. See | |
| NC | R04000-003-006-000 | Agrium U.S., Inc. | 2400 HWY 421 N Wilmington, NC 28402 | Marvin Hilton 13131 Lake Fraser Dr. SE Calgary, AB, Canada T2J 7E8 e-mail: marvin.hilton@nutrien.com phone: 403-225-7308 | Accessible soil removed in 2012 and 2019. Additional soil removal needed. Arsenic and lead remain under soil cover and arsenic is in the groundwater. | additional detail in cover letter. Property owner refused to sign Consent Form in March 2013. Consent Form sent to property owner again in 2017 and 2018 with no response. Consent Form sent to new property owner contact in February 2019 with no response. Additional soil removal required. Deed restriction area may change. | Fifth year of groundwater monitoring completed in February 2020. Prepare and submit groundwater evaluation. Perform additional soil removal. Send Consent Form to property owner again. |

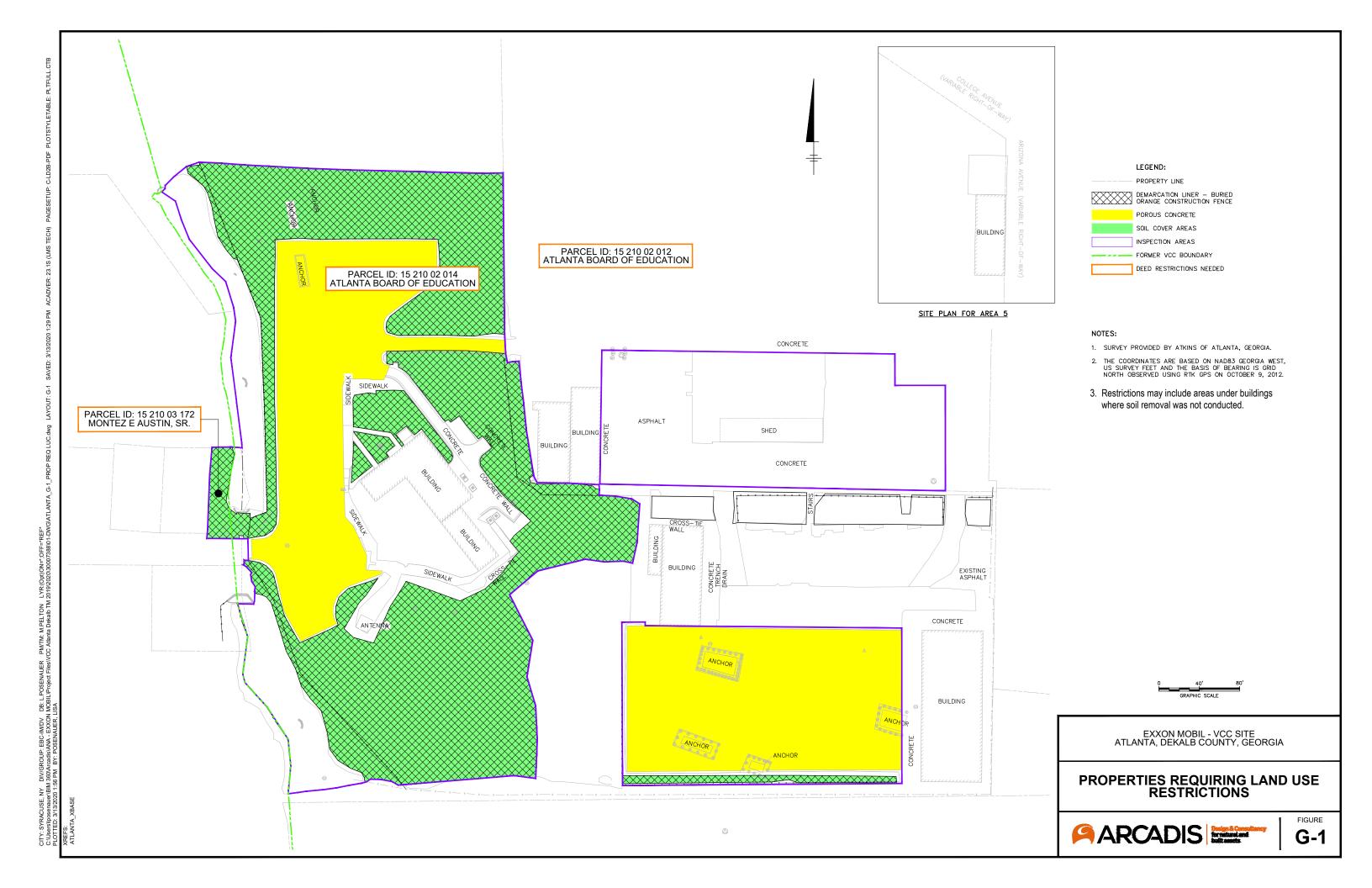
| Site Name | Tax Parcel Number/ | 0 | Physical Presents Address | Proporty Contact Information | Delineation Information | Comments on Status | Nové Stano |
|----------------------|--------------------------|---|---|--|---|---|---|
| Wilmington (Navassa) | | Owner ecorded) | Physical Property Address | Property Contact Information | Delineation information | Comments on Status | Next Steps |
| NC | , (6,1 4554 155415451115 | | | | | | |
| | 3000006 | Edwards A M TR & VA Creech Jr. Est. | off of Quality Drive, Navassa, NC 28 | The Clark Group Paul Clark 4918 Wrightsville Ave. Wilmington, NC 28403 e-mail: paul.clarkgroup@gmail.com phone - 910-392-5555 | Arsenic and lead remain in soil under cap and in groundwater. | On July 26, 2013, the Respondents attended a meeting in NCDEQ's office in Raleigh, NN to discuss administrative approaches for obtaining a Declaration of Perpetual Land Use Restrictions for the site. An outcome of a July 26, 2013 meeting identified three potential administrative options to place land use restrictions on the site. These options are documented in September 23, 2013 correspondence from NCDEQ. On October 10, 2013, NCDEQ, USEPA, and Respondents held a conference call and reached an agreement regarding the implementation of Administrative Controls. As documented in a December 9, 2013 correspondence from Arcadis, all entities agreed that Respondents would continue to implement the ongoing monitoring over a 5 year monitoring period in accordance with the 2005 AOC as detailed in the August 3, 2012 Post-Removal Site Control Plan. During this period there is no need to enter into land use restrictions. If a future use of the site is identified or at the end of the 5 year monitoring period, the options available for implementing land use restrictions at the site will be reviewed again and a path forward decision will be made at that time. | Identify path forward when future use is identified. |
| Winston-Salem, NC | (0/3 deed restrictions r | recorded) | 1 | 1 | 1 | NCDEQ prefers to review draft deed language as part of RAP submittal. See additional detail in cover letter. | |
| | 6836-59-0413.00 | OmniSource Southeast, LLC (formerly Atlantic Scrap) | 3411 N. Glenn Ave, Winston- Salem, NC | Steve Earp e-mail: Steve.Earp@smithmoorelaw.com | Soil removed in 2010. Lead is in groundwater. | Soil above site-specific action levels removed from property. Waiting on groundwater evaluation to determine if GW restriction is needed. | Fifth year of groundwater monitoring completed in September 2019. Prepare and submit groundwater evaluation in 2020. Redevelop WS MW-06 and resample. |
| | 6836-58-8215.00 | Norfolk Southern ROW | 3000 N. Liberty St, Winston-Salem NC | , Scott Pittenger e-mail: scott.pittenger@nscorp.com Pauline Foreman e-mail: pauline.foreman@nscorp.com phone: 757-823-5434 Norfolk Southern Corp.; Law Dept. | Accessible soil removed in 2010. Arsenic and lead remain in soil under cap and lead is in adjacent groundwater. | Waiting on groundwater evaluation to determine if GW restriction is needed. | Evaulate extent of impacted soils of Norfolk Sourthern ROW property to determine if soil restrictions are required. |
| | NA | NC DOT ROW | ROW - Highway 52, Winston- Salem, NC | | Accessible soil removed in 2010. Arsenic and lead remain in soil under cap and lead is in adjacent groundwater. | In February 2020, NCDEQ indicated that NCDOT will not give consent for deed restrictions due to past experience. | Develop roadmap with USEPA to implement deed restrictions. |
| SOUTH CAROLINA S | SITES | | | | groundwater | | • |
| Atlantic Phosphate | (0/1 deed restriction re | ecorded) | | | | | |
| (Charleston, SC) | 4660000012 | South Carolina Electric & Gas Co | 2200 Hagood Road, Charleston, SC 29405 | Tim Lucius e-mail: tlucius@scana.com phone: 843-576-8204 | Soil removed in 2010/2011. Arsenic and lead remain in soil under cap and in groundwater. | Working with property owner on deed restriction language as far back as 2013. Additional work as requested by owner completed. Owner re-engaged for deed restriction lauguage in April 2019. Attorney review required. | Modify deed restriction language per request of property owner, provide for review, and then record |
| Blacksburg, SC | (1/5 deed restrictions r | recorded) | 1 | 1 | 1 - | Town of Blacksburg deed obtained; long-term GW monitoring terminated in 2019. GW no longer needs to be restricted. | |
| | 153-00-00-038.001 | Barry Bailey | 606 N Shelby Street, Blacksburg, SC | Barry Bailey PO Box 63 Blacksburg, SC 29702 864-839-6023 | Soil removed in 2010/2011. Arsenic and lead remain in soil under cap. | Need deed restriction to be consistent with language used for conservation easement. Can re-engage now that restriction is limited to soil. | Develop roadmap with USEPA to implement deed restrictions. |
| | 173-00-00-003.000 | Doris Bright | 153 Old Shelby Street | Doris Bright 702 Union Street Gaffney, SC 29340 | Soil removed in 2010/2011. Arsenic and lead remain in soil under cap. | Need deed restriction to be consistent with language used for conservation easement. Can re-engage now that restriction is limited to soil. | Develop roadmap with USEPA to implement deed restrictions. |
| | 173-00-00-004.000 | Lawrence Bright | 117 Old Shelby Street | Lawrence Bright 702 Union Street Gaffney, SC 29340 | Soil removed in 2010/2011. Arsenic and lead remain in soil under cap. | Need deed restriction to be consistent with language used for conservation easement. Can re-engage now that restriction is limited to soil. | Develop roadmap with USEPA to implement deed restrictions. |
| | RR ROW | Norfolk Southern Railroad ROE00141 | RR ROW | Ms. Pauline Foreman Law Department, Box 241 Norfolk Southern Corporation Three Commercial Place Norfolk, Virginia 23510 757-823-5434 | Soil removed in 2010/2011. Arsenic and lead remain in soil under cap. | Need deed restriction to be consistent with language used for conservation easement. Can re-engage now that restriction is limited to soil. | Develop roadmap with USEPA to implement deed restrictions. |

Table 1
Details on Remaining Deed Restrictions
Former Virginia-Carolina Chemical Corporation Sites
Updated: 3/19/2020

| | Tax Parcel Number/ | | | | | | |
|--|--|---------------------------------|--|--|---|--|--|
| Site Name | Identification | Owner | Physical Property Address | Property Contact Information | Delineation Information | Comments on Status | Next Steps |
| eenville, SC | (1/3 deed restrictions r | ecorded) | | | No groundwater sampling required | | |
| | 225000100100 | Solid Ground Ministries | 1805 Anderson Road, Greenville, SC | Pastor Thomas Jones 501 South Artillery Court Piedmont, SC 29673 phone: 864-233-3310 | Soil removal completed between 2012 and 2014. Demarcation liner installed where impacted soils remain below depth of historical excavation. | Initial request was made following a meeting on 11/5/08. Have called, texted, mailed owner several times over the years. Most recent chain of communications includes the following: Sent revised covenants to Solid Ground on 3/28/16 for Pastor Jones to review with attorney; confirmed receipt of covenants 3/30/16. Latest communication via phone on 6/2/16; owner concerned about future development restrictions. Explained covenant allows XOM to assist with any issues similar to Greenville County property. Owner indicated he will get back next week. Sent email to Pastor Jones on 6/20/16. Sent another email and left VM on 7/26/16. Sent another email on 8/22/16. Sent email & text on 6/7/17. | Develop roadmap with USEPA timplement deed restrictions. |
| | 225000100106 | D&D Properties of Greenville | 1811 Anderson Road, Greenville, SC | Connie Davis phone: 864-220-0490 128 Sydney Ln Piedmont, SC 29673 e-mail: cdavis@daviserectinginc.com | Soil removal completed between 2012 and 2014. Demarcation liner installed where impacted soils remain below depth of historical excavation. | Initial request made following meeting with Arcadis/SCDHEC 11/5/08. Calls have been made since that time but have not received return call. Property ownership has changed a few times since 2008 from the individual (Connie Davis) to his company identities (e.g., David Erecting, D&D). | Develop roadmap with USEPA to implement deed restrictions. |
| on Pon, SC | (8/9 deed restrictions r | ecorded) | | 100000000000000000000000000000000000000 | | | • |
| | 0470000039 | Charles Rutherford | 9434 Savannah Hwy, Adams Run, SC | Charles Rutherford & Linda Rutherford P.O. Box 337 Jacksonboro, SC 29452 | Soil removal completed in 2010. Arsenic and lead remain in soil under cap and arsenic in groundwater. | Owner refused to sign deed restrictions. USEPA (Ken Mallary and Kevin Beswick) agreed that ExxonMobil put forth due dilligence effort. USEPA indicated only path forward would be to request a court order to require the property owner to sign the covenant, and USEPA opted not to pursue per email dated Oct 5, 2017. | Develop roadmap with USEPA to implement deed restrictions if restriction required - see note in previous column. |
| ort of Baldwin Mines ort Royal, SC) | s (31/38 deed restriction R110 009 00A 0037 | s recorded) Anne Hunter | 67 Shipwright Circle, Port Royal, | 1929 Little River Road, Flat Rock, NC 28731 | Soil removal for arsenic and lead | Site access not previously obtained (letters sent 3/25/11, 10/3/11, 8/11/16). Soil | Deed restrictions to be impleme |
| | 0000 | | SC | | needed. Arsenic in groundwater. | removal access recently obtained; plan and implement soil removal. Deed restrictions will be implemented following completion of soil removal. | following soil removal activities. |
| | R110 009 00A 0070 0000 | John Smith II | 9 Mariners Court, Port Royal, SC | 9 Mariners Court, Port Royal, SC | Soil removal completed in 2008. Arsenic and lead remain in soil under cap and arsenic in groundwater. | Sent letters 3/25/11, 10/3/11, 8/11/16. No response received to date. | Develop roadmap with USEPA to implement deed restrictions. |
| | R110 009 00A 0020 0000 | James Crower | 33 Shipwright Circle, Port Royal, SC | 33 Shipwright Circle, Port Royal, SC | Soil removal completed in 2008. Arsenic and lead remain in soil under building and arsenic in groundwater. | Sent letters 3/25/11, 10/3/11, 8/11/16. No response received to date. | Develop roadmap with USEPA to implement deed restrictions. |
| | R110 009 00A 0032 0000 | Marny VonHarten | 57 Shipwright Circle, Port Royal, SC | 57 Shipwright Circle, Port Royal, SC | Soil removal completed in 2008. Arsenic and lead remain in soil under cap and arsenic in groundwater. | Sent letters 3/25/11, 10/3/11, 8/11/16. No response received to date. | Develop roadmap with USEPA to implement deed restrictions. |
| | NA | DOT | NA | SCDOT 13 Munch Drive Beaufort, SC 29906 | Soil removal completed in 2008. Arsenic and lead remain in soil under cap and arsenic in groundwater. | No formal request made to date. | Develop roadmap with USEPA to implement deed restrictions. |
| | R110 009 000 026C 0000, R110 009 000 026B 0000 | Riverwind | Riverwind Drive, Port Royal, SC | Riverwind Homeowners Association Inc Attn: Palmetto Shores Management 1551 Sea Island Parkway St. Helena Island, SC 29920 | Soil removal completed in 2008. Arsenic and lead remain in soil under cap and arsenic in groundwater. | No formal request made to date although have deed restrictions for many properties through Price Protection Program. | Develop roadmap with USEPA timplement deed restrictions. |
| | R110 009 000 026A 0000 | River Club | 1231 Ladys Island Drive, Port Royal, SC | River Bluff Limited P/S 1010 East North St, Suite A Greenville, SC 29601 | Soil removal completed in 2008. Arsenic and lead remain in soil under cap and arsenic in groundwater. | Sent deed restriction template on 2/21/18 to Property Manager, Mary Beth Kirkland. Called her on 8/2/18 and she asked that I send another copy. Sent out 8/2/18. No response received to date. | Develop roadmap with USEPA to implement deed restrictions. |

| | Tax Parcel Number/ | | | | | | |
|---------------------------------------|---|--|---|--|---|--|--|
| Site Name | Identification | Owner | Physical Property Address | Property Contact Information | Delineation Information | Comments on Status | Next Steps |
| wift Agri-Chem Iorth Charleston, S | (0/2 deed restiction red C) | corded) | | | | | |
| | 469000010, 469000011, 4690000013, 4690000015, 4690000019, 4690000021 | Charleston County Park and Recreation Commission (CCPRC) | 2700, 2720, 2730, 2745, 2750, and 2769 Speissegger Dr, North Charleston, SC 29405 | Patricia Newshutz 861 Riverland Drive Charleston, SC 29412 e-mail: pnewshutz@CCPRC.com phone: 843-762-8112 | Soil removed in 2011/2012. Arsenic and lead remain in soil under cap and in groundwater. | Owner entered into a Voluntary Cleanup (VC) Contract with SCDHEC on March 2, 2015. It was determined in May 2019 that despite properties being entered into the VC program with contracts, ICs had yet to be placed on the property. It was indicated that the ICs should outline proper soil removal, minimum clean soil cover of 2 ft, maintain barriers from VCC work, and maintenance of a Site Management Plan. | |
| | 4690000009 | Palmetto Lowcountry | 2777 Speissegger Dr., North Charleston, SC 29405 | Palmetto Lowcountry Behavioral Health 2777 Speissegger Drive North Charleston, SC 29405 phone: 843-747-5830 | Soil removed in 2011/2012. Arsenic and lead remain in soil under cap. | Draft language submitted to owner on 6/4/14. No response received to date. | Develop roadmap with USEPA to implement deed restrictions. |
| Vando Charleston, SC) | (1/3 deed restrictions r | ecorded) | | <u> </u> | Groundwater sampling terminated in 2013. | | |
| | 4690000017 | Osprey View LLC | 2376 Baker Hospital Blvd, North Charleston, SC | Charlie Masencup e-mail: charliemasencup@yahoo.com phone: 843-408-1400 Horne Realty, LLC 1201 S Magnolia Street Summerville, SC 29483 | Soil removal completed in 2012. Arsenic and lead remain in soil under cap. | Owner entered into a VC Contract with SCDHEC in 2018 (VCC 18-6536-NRP). It was determined in May 2019 that despite properties being entered into the VC program with contracts, ICs had yet to be placed on the property. It was indicated that the ICs should outline proper soil removal, methane engineering control, minimum clean soil cover of 2 ft, maintain barriers from VCC work, and maintenance of a Site Management Plan. | Develop roadmap with USEPA to implement deed restrictions. |
| | 4690000020, 4690000002 | Charleston County Parks and Recreation Commission | 2381 Baker Hospital Blvd, North Charleston, SC | Patricia Newshutz 861 Riverland Drive Charleston, SC 29412 e-mail: pnewshutz@CCPRC.com phone: 843-762-8112 | Soil removal completed in 2012. Arsenic and lead remain in soil under cap. | Owner entered into a VC Contract with SCDHEC in 2015 (VCC 14-6219-NRP). It was determined in May 2019 that despite properties being entered into the VC program with contracts, ICs had yet to be placed on the properties. It was indicated that the ICs should outline proper soil removal, methane engineering control, minimum clean soil cover of 2 ft, maintain barriers from VCC work, maintenance of a Site Management Plan. | Develop roadmap with USEPA to implement deed restrictions. |
| ENNESSEE SITES | } | | | | - | 10-2-10-20-20-20-20-20-20-20-20-20-20-20-20-20 | - |
| Memphis, TN | (0/1 deed restriction re | corded) | | | Groundwater sampling termination approved in April 2018. | | |
| | 033053-00004, 033053 00005, 033053-00006 | | 152, 174, 200 Collins Street Memphis, Tennessee | Shellie Moses - Property Manager Colliers International 6363 Poplar Ave, Ste 400 Memphis, TN 38119 e-mail: shellie.moses@colliers.com phone: 901-312-5752; (m) 901-508-6909 | Soil removal completed in 2014/2015. Arsenic and lead remain in soil under cap. | Deed Restriction language approved by USEPA and state on August 9, 2019. Need property owner's approval. | Finalize the Deed Restriction/ Environmental Covenant with property owner. |
| ALABAMA SITES | • | | | | • | • | • |
| Birmingham, AL | (0/3 deed restriction re | , | | | | | |
| | 23 00 19 2 001 005.000 | PB Service, inc. | 3700 14th Ave | Christopher Bond Bond Industries, Inc. 3700 14th Ave N Birmingham, AL 35234 205.907.8007 | Soil removal completed in 2016. Arsenic and lead remain in soil under cap and in groundwater. | Draft restriction language sent to owner. No response received to date. | Develop roadmap with USEPA to implement deed restrictions. |
| | DOT ROW | ALDOT | DOT ROW | Robert Camp, Steve Haynes, etc. William D. McDaniel, P.E. Operations Engineer East Central Region-Birmingham Area Alabama Department of Transportation 1020 Bankhead Hwy. West P.O. Box 2745 Birmingham, AL 35202-2745 Ph. (205) 328-5820 Email: mcdanielw@dot.state.al.us | Soil removal completed in 2016. Arsenic and lead remain in soil under cap and in groundwater. | Additional work pending on DOT ROW. In June 2018 DOT said they are ready to reengage on additional work on ROW but did not agree with our plans for limited removal - deed restrictions will be discussed affer ROW work is completed. | Develop roadmap with USEPA to implement deed restrictions. |
| | RR ROW | CSX RR | RR ROW | Kevin Boland, PG CSX Transportation, Inc. | Soil removal completed in 2016. Arsenic and lead remain in soil | RR requested additional soil removal which is not required per agency. Deed restrictions will be discussed after resolution with RR is reached. | Develop roadmap with USEPA to implement deed restrictions. |

| | Tax Parcel Number/ | | | | | | |
|-----------------------|--------------------------|---------------------------|---------------------------------|---|-----------------------------------|--|-------------------------------------|
| Site Name | Identification | Owner | Physical Property Address | Property Contact Information | Delineation Information | Comments on Status | Next Steps |
| Mobile, AL | (1/3 deed restrictions r | , | | | | | |
| | R022902440005292 | Daniel Schambeau (2 | 901 North Kate St, Prichard, AL | Daniel Schambeau | Soil removal completed between | Deed restriction language drafted and approved by USEPA and ADEM. Procured | Complete work in easement and |
| | R022902440005297 | properties) | | e-mail: dschambeau@virginiawrecking.com | 2014 and 2016. Arsenic and lead | easement on adjacent property and planning field work needed to modify the | then have property owner sign deed |
| | | | | phone: 251-928-3067 | remain in soil under cap and | easement to facilitate negotiations for a deed restriction. | restriction. |
| | | | | P.O. Box 2730 | arsenic in groundwater. | | |
| | | | <u> </u> | Daphne, AL 36526 | | | |
| | NA | Illinois Central Railroad | Northwest of the New Bay Bridge | Canadian National Railroad | Soil removal completed between | Working with attorney for railroad to negotiate deed restriction language. | Follow up with railroad on deed |
| | | Company | Road and I-165 (MP 2.6 between | | 2014 and 2016. Arsenic and lead | | restriction language. |
| | | | MP 2.6 Beaumonth Subdivision), | | remain in soil under cap and | | |
| | (2/2) | 1 | Prichard, AL | | arsenic in groundwater. | | |
| Wylam, AL | (0/3 deed restriction re | corded) | | | No groundwater sampling required | . Awaiting completion of Phase 2 soil removal before determining limits of required deed restrictions. | |
| | 30 00 03 1 001 001.00 | 0 US Steel | 3030 Park Rd E | Jason Parham | Soil removal completed in | Awaiting completion of Phase 2 soil removal before determining limits of required | Complete Phase 2 soil removal |
| | | | Pleasant Grove, AL | Jparham@uss.com | 2012/2013. Arsenic and lead | deed restrictions. | activities. |
| | | | | 205-783-2306 (fax) | remain in soil under cap. | | |
| | | | | 205-783-2500 (phone) | | | |
| | 30 00 02 2 014 001.00 | 0 Lester Ayers | 5400 10th Ave | Lester Mack Ayers (or Jackie?) | Soil removal completed in | Awaiting completion of Phase 2 soil removal before determining limits of required | Complete Phase 2 soil removal |
| | | | Birmingham, AL | 205-938-0570 | 2012/2013. Arsenic and lead | deed restrictions. | activities. |
| | | | | | remain in soil under cap. | | |
| | 30 00 03 1 001 002.00 | 0 Western Properties | 5502 10th Ave | Jason Spinks | Soil removal completed in | Awaiting completion of Phase 2 soil removal before determining limits of required | Complete Phase 2 soil removal |
| | | | Birmingham, AL | 205-288-2057 | 2012/2013. Arsenic and lead | deed restrictions. | activities. |
| | | | | | remain in soil under cap. | | |
| EMES FACILITATING | (0/1 deed restriction re | corded) | | | | Awaiting completion of soil removal before determining limits of required deed restrictions. | |
| Louisville, KY (Black | 039H00260000 | FCBKY Holdidng, LLC | 1391 Dixie Highway | Adam. T. Goebel | Soil removal on-going; completion | Draft Restriction language prepared and included in Corrective Action Plan dated | Complete soil removal activities in |
| Leaf) | | | Louisville, KY 40210 | Stoll Keenon Ogden PLLC | anticipated in April. GW | Sept 2018. Once soil removal is completed in Q2 2020, restriction will be finalized | Q2 2020 prior to finalizing and |
| | | | | 2000 PNC Plaza, 500 West Jefferson Street | investigation on-going. | and recorded. Attornies currently working on review. | recording deed restriction. |
| | | | | Louisville, KY 40202 | | | |
| | | | | 502-568-5705 Direct | | | |
| | | | | 502-333-6099 Facsimile | | | |
| | | | | adam.goebel@skofirm.com | | | |





CURRENT PROPERTY LINE

RAILROAD TRACKS

FENCE

ASPHALT OR CONCRETE AREA

AREA WHERE DEMARCATION BARRIER WAS PLACED

REMOVAL AREA



AREA WITH EXISTING SOIL COVER AT LEAST 2 FEET THICK; SOIL IMPACTS

PRESENT BELOW

FORMER VCC BOUNDARY

DEED RESTRICTIONS NEEDED

NOTES:

- 1. SURVEY PROVIDED BY RHODES ENGINEERING SERVICES, INC. OF CARTERSVILLE, GEORGIA (SEPTEMBER 2008, MAY 2009, AND OCTOBER 2009) AND BY LOWERY & ASSOCIATES DURING CONSTRUCTION.
- 2. SELECT AREAS HAVE IMPACTS BELOW 2 FT; THEREFORE, A DEMARCATION BARRIER WAS INSTALLED AT THESE AREAS.
- 3. Restrictions may include areas under buildings and/or driveways where soil removal was not conducted.

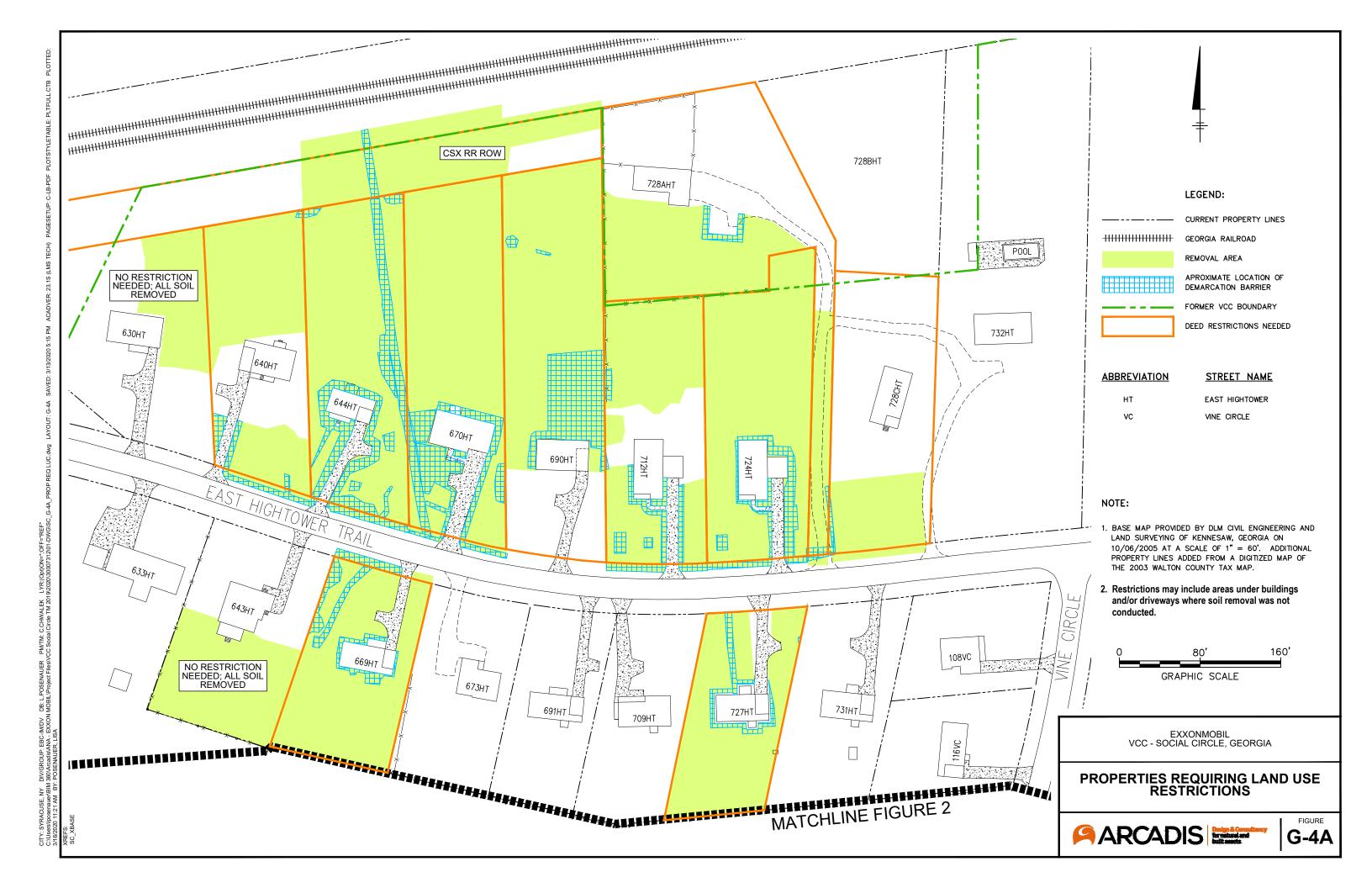


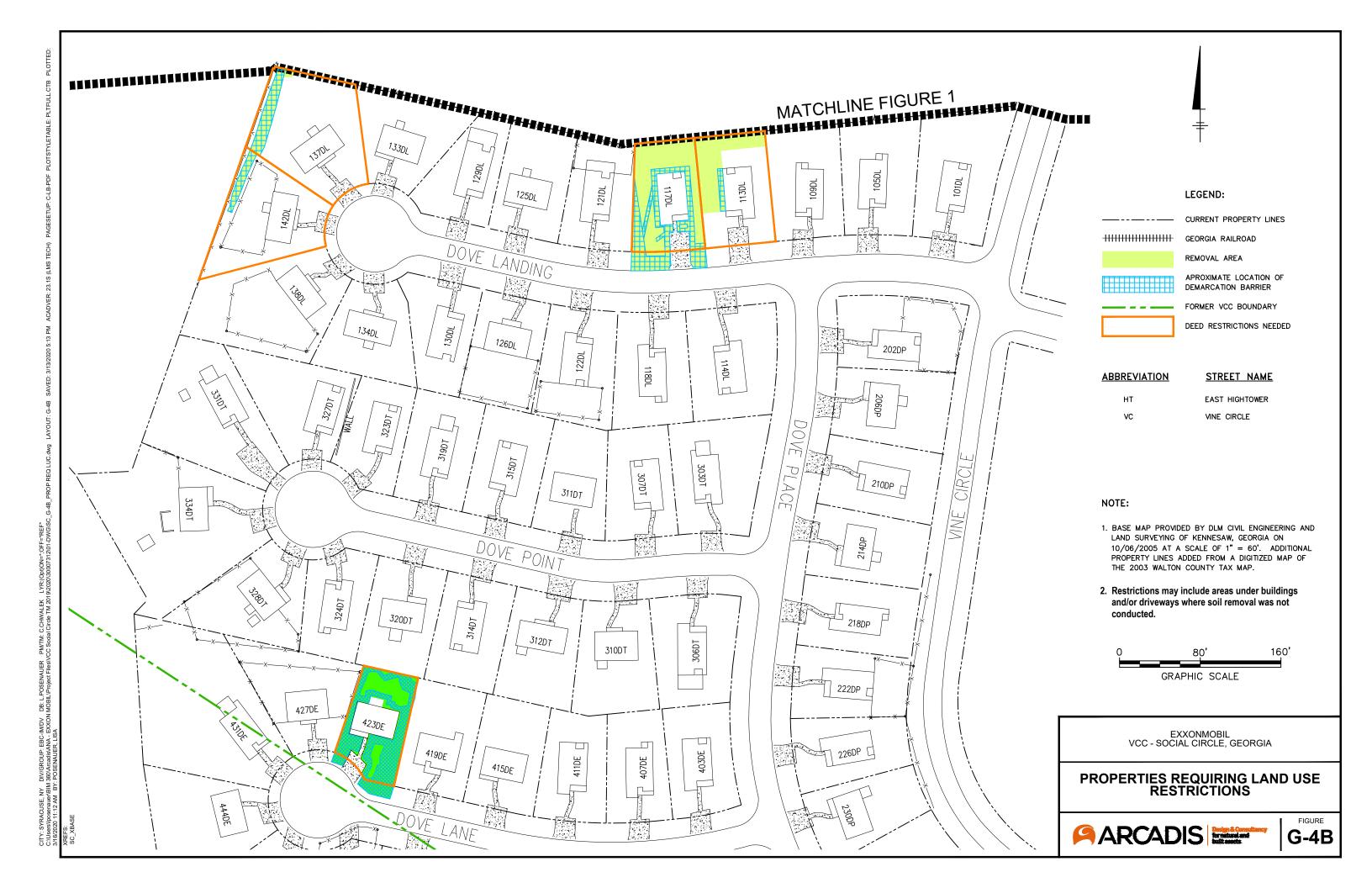
EXXONMOBIL ROME, GEORGIA

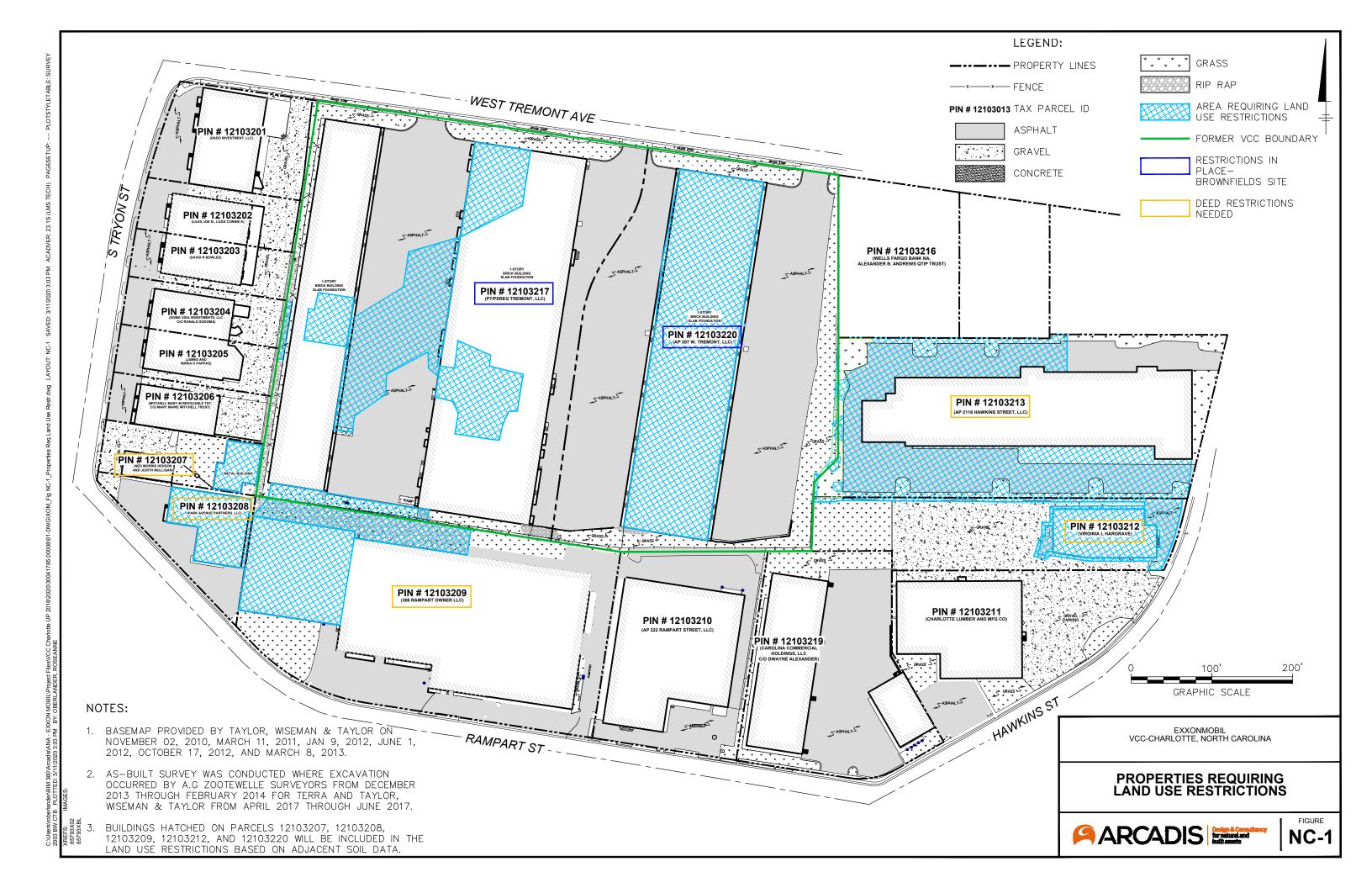
PROPERTIES REQUIRING LAND USE RESTRICTIONS

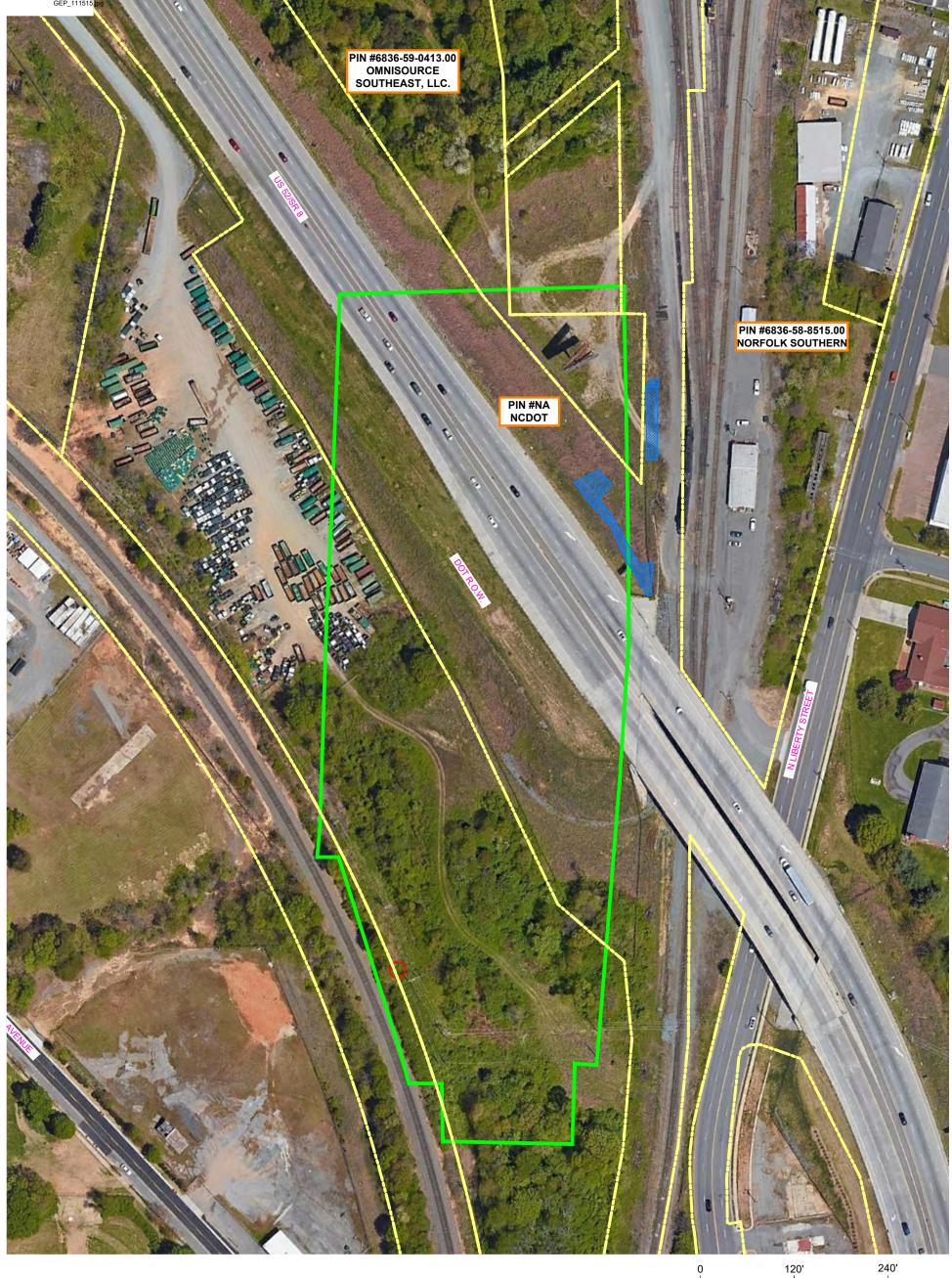


G-3









LEGEND:

APPROXIMATE LOCATION OF THE VIRGINIA—CAROLINA 1. CHEMICAL CORPORATION PLANT FENCE LINE (APPROXIMATE BOUNDARY OF THE FIRST LOT OF THE ORIGINAL PLACE) 2.

CURRENT TAX PARCEL BOUNDARIES

DEED RESTRICTION NEEDED AREA REQUIRING LAND USE RESTRICTIONS

NOTES:

- 2015 AERIAL PHOTOGRAPH OF WINSTON-SALEM PROVIDED BY GOOGLE EARTH PRO.
- PARCEL BOUNDARIES DIGITIZED FROM 2015 FORSYTH COUNTY COMPILATION OF RECORDED PLATS.

FORMER STREET NAMES: INDIANA AVE. (FKA INVERNESS AVE.) LIBERTY ST. (FKA WALKERTOWN RD.)



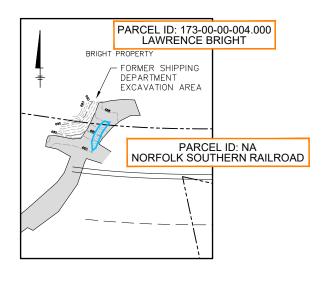
GRAPHIC SCALE

EXXONMOBIL WINSTON-SALEM, FORSYTH COUNTY, NORTH CAROLINA

PROPERTIES REQUIRING LAND USE RESTRICTIONS



NC-6



----- PROPERTY LINE --- 660 ---- 5' INDEX TOPOGRAPHIC CONTOUR 1' TOPOGRAPHIC CONTOUR ---- REALIGNED CREEK ###### RAILROAD ×--- FENCE STRUCTURE PAVED/GRAVEL ROAD DEMARCATION LINER AREA NOT EXCAVATED DUE TO SLOPING REQUIREMENTS FORMER VCC BOUNDARY

DEED RESTRICTIONS NEEDED

LEGEND:

NOTES:

- 1. SURVEY PROVIDED BY LAVENDER, SMITH & ASSOCIATES, INC. OF SPARTANBURG, SOUTH CAROLINA.
- 2. TOPOGRAPHIC CONTOURS IN 1 FOOT INTERVALS BASED ON POST REMOVAL ACTION DATA. ELEVATIONS SURVEYED IN REFERENCE TO SC GRID NORTH (NORTH AMERICAN DATUM 1983).

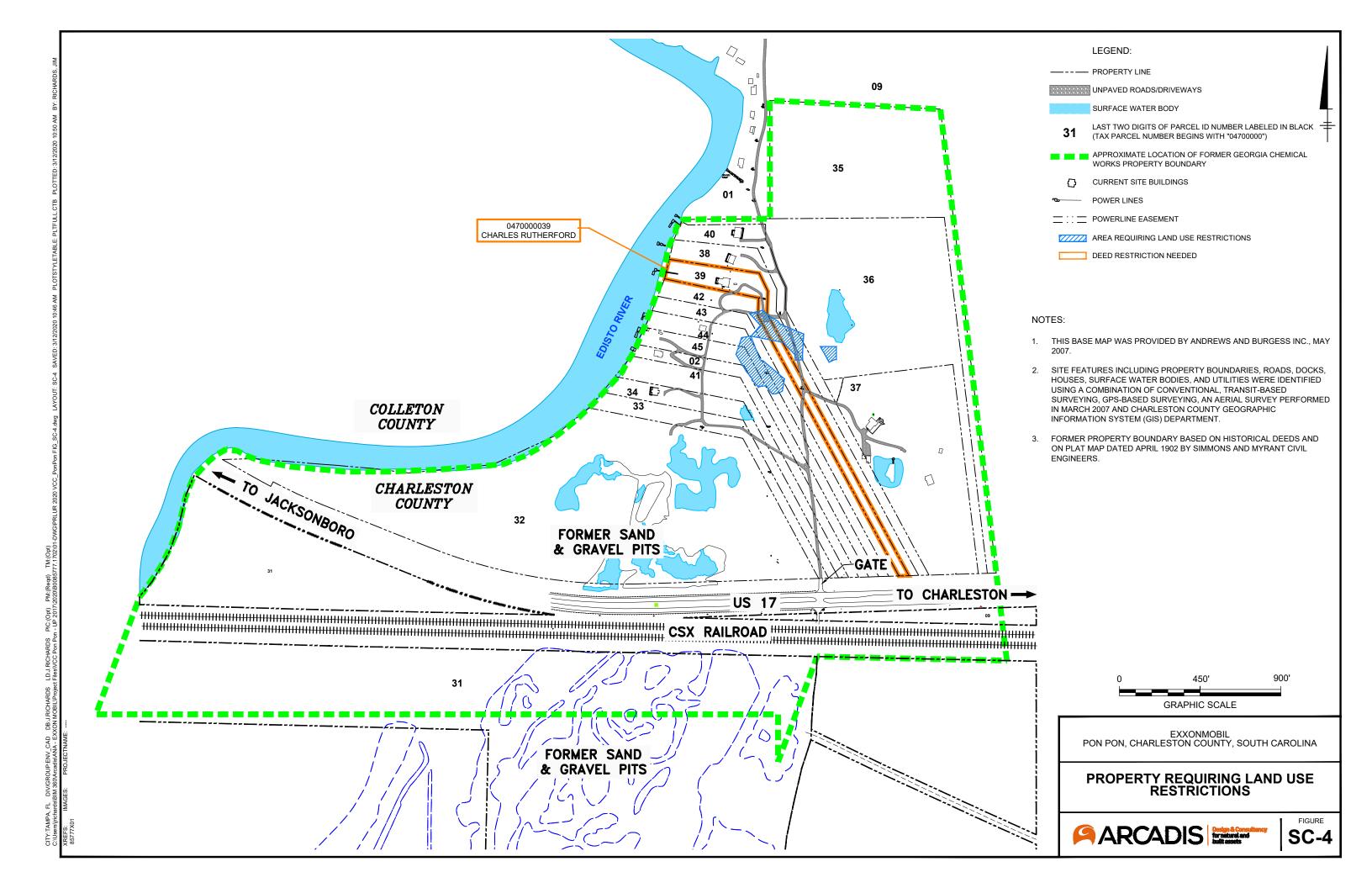


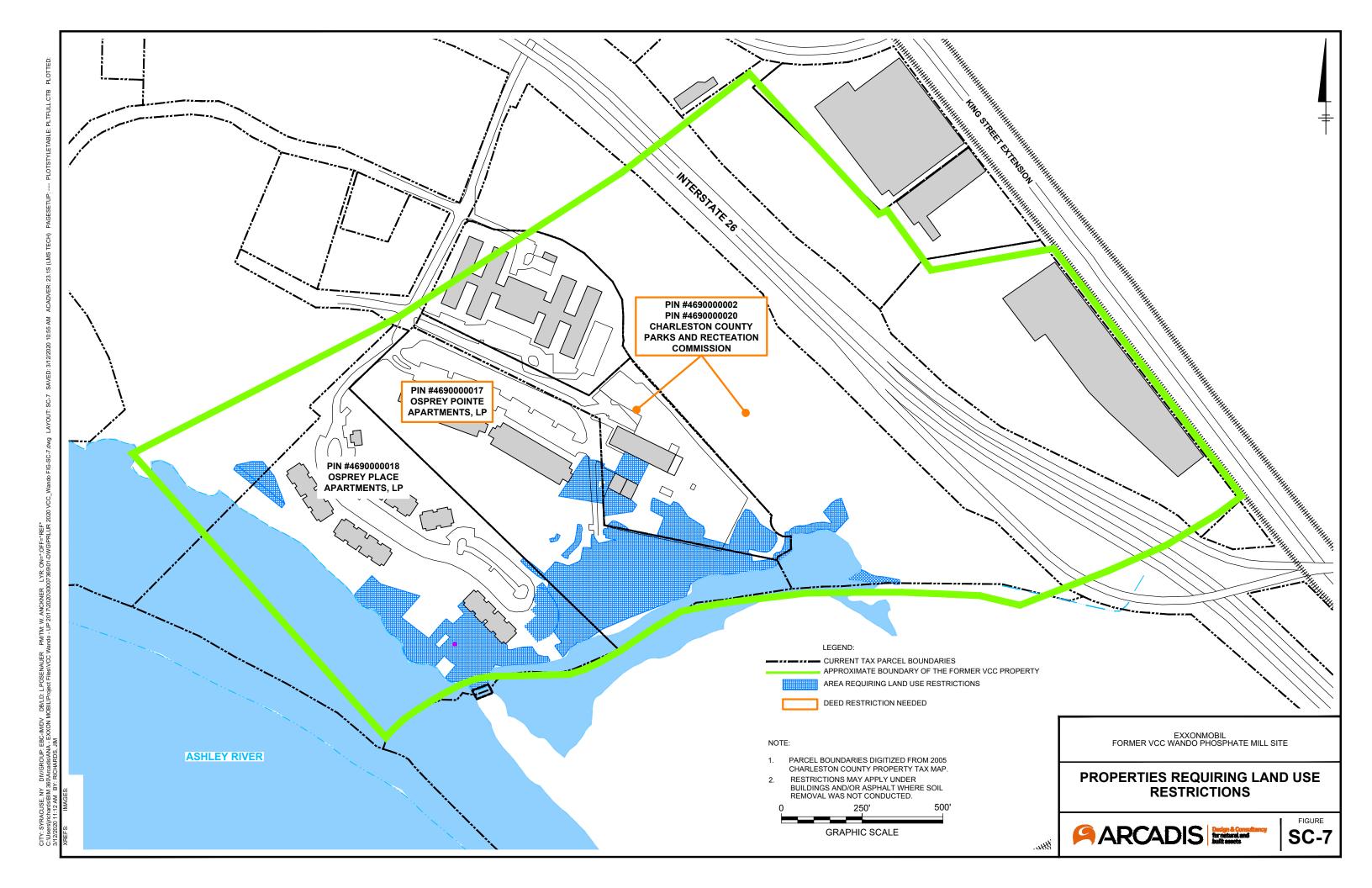
EXXONMOBIL - FORMER VCC BLACKSBURG SITE BLACKBURG, SOUTH CAROLINA

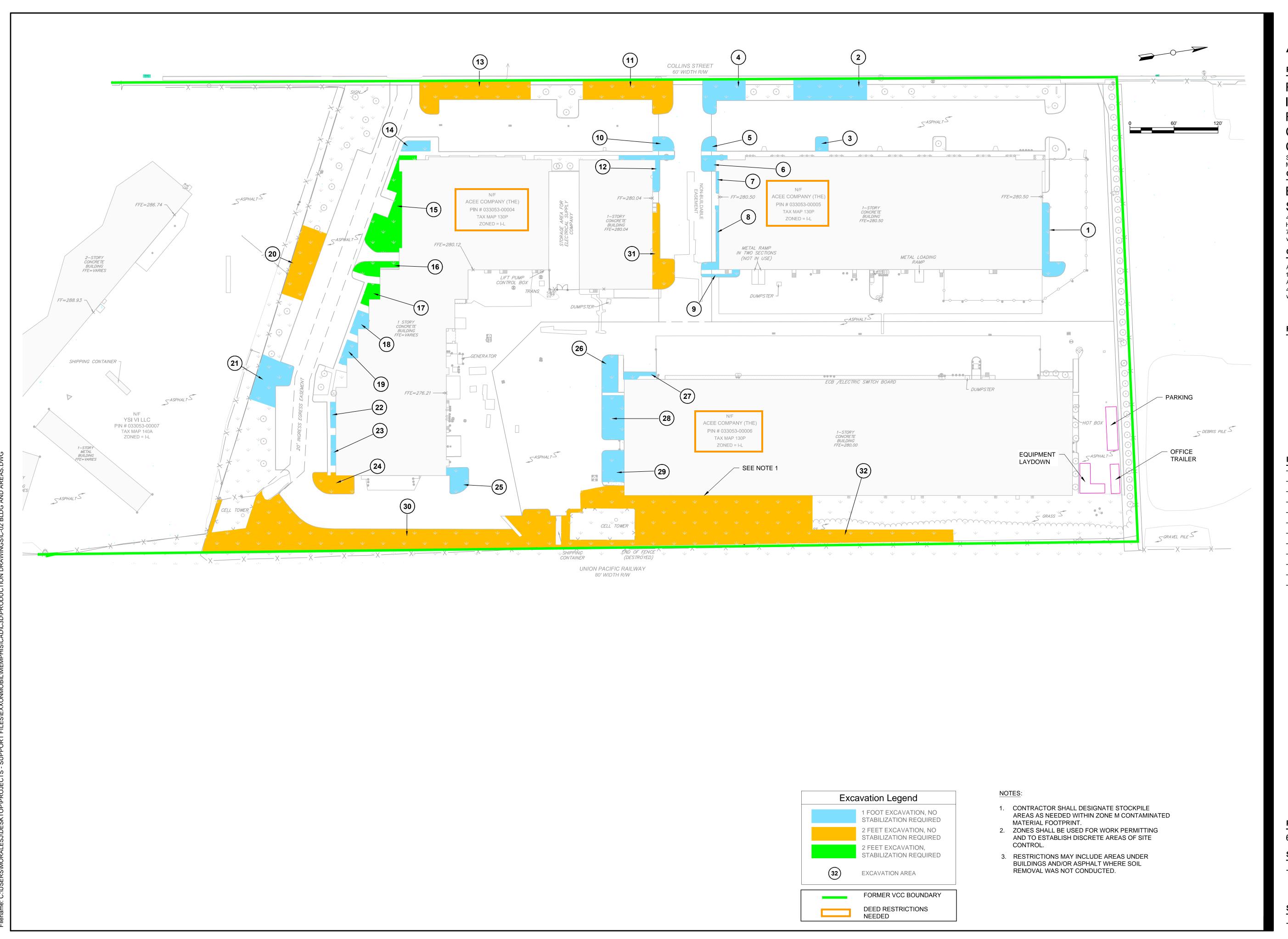
PROPERTIES REQUIRING LAND USE RESTRICTIONS



SC-2







AECOM

REMOVAL ACTION FOR **IMPACTED SOILS** FORMER VIRGINIA CAROLINAS CHEMICAL COMPANY

SITE - 152 COLLINS STREET MEMPHIS, TN CLIENT

EXXONMOBIL GLOBAL SERVICES COMPANY

4500 DACOMA STREET, STE 772 HOUSTON, TX 77092 713.680.5384 tel 414.921.3819 fax www.exxonmobil.com

CONSULTANT

AECOM

1360 PEACHTREE STREET, NE, STE 500 ATLANTA, GA 30309 404.965.9600 tel 404.965.9605 fax www.aecom.com

REGISTRATION

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